

## REMARKS

### I. INTRODUCTION

In response to the Office Action dated March 27, 2006, claims 1, 10 and 19 have been amended. Claims 1-3, 5-12, 14-21 and 23-27 remain in the application. Entry of these amendments, and re-consideration of the application, as amended, is requested.

### II. PRIOR ART REJECTIONS

#### A. The Office Action Rejections

In paragraphs (4)-(5) of the Office Action, claims 1-3, 5-12, 14-21 and 23-27 were rejected under 35 U.S.C. §102 as being anticipated by Melchione et al., U.S. Patent 5,930,764 (Melchione).

Applicants' attorney respectfully traverses these rejections.

#### B. The Applicants' Independent Claims

Independent claims 1, 10 and 19 are directed to a method, system and article of manufacture for generating analytic data sets for use in modeling in customer relationship marketing. Claim 1 is representative, and comprises a computer-implemented method of generating analytic data sets for use in modeling in customer relationship marketing, comprising: (a) specifying one or more Variable Groups, wherein the Variable Group is a set of Analytic Variables with similar characteristics and the Analytic Variables are comprised of both primitives and conditions; (b) creating an Analytic Data Set Template containing one or more of the Analytic Variables selected from the specified Variable Groups and required for a specific analysis task, wherein execution conditions are defined for the Analytic Data Set Template; and (c) generating SQL statements to retrieve and generate the Analytic Variables contained in the Analytic Data Set Template from a database using the primitives and conditions of the Analytic Variables.

#### C. The Melchione Reference

Melchione describes a sales process support system and method for identifying sales targets using a centralized database to improve marketing success. The system includes a central database that receives comprehensive information from a variety of internal and external feeds, and standardizes and households the information in a three-level hierarchy (households, customers, and accounts) for use by a financial institution. The comprehensive information stored on the central database is accessed through micromarketing workstations to generate lists of sales leads for

marketing campaigns. A database engine is provided for generating logical access paths for accessing data on the central database to increase speed and efficiency of the central database. The system distributes sales leads electronically to branch networks, where the sales leads are used to target customers for marketing campaigns. The central database is accessed by workstations of a central customer information system for profiling customers, enhancing customer relationships with the financial institution, and electronically tracking sales and service performance during marketing campaigns. The system can also include a system for opening an account in a single session that is in communication with the central database, micromarketing centers, central customer information systems and branch systems of the present invention so that data can pass between these systems where legal and appropriate.

D. Applicants' Independent Claims Are Patentable Over The References

Applicants' invention, as recited in independent claims 1, 10 and 19, is patentable over the Melchione reference, because the claims recite limitations not found in the reference.

Nonetheless, in the section entitled "Response to Arguments," the Office Action asserts that Melchione teaches the Applicants' claimed invention, because Melchione utilizes SQL as its database language. According to the Office Action, SQL is known to contain primitives, conditions, variables and templates, as recited in Applicants' claims.

Applicants' attorney disagrees with this analysis in view of the amendments set forth above and the arguments set forth below.

Applicants' claims now recites "generating SQL statements to retrieve and generate the Analytic Variables contained in the Analytic Data Set Template from a database using the primitives and conditions of the Analytic Variables," wherein the Analytic Data Set Template contains one or more of the Analytic Variables selected from specified Variable Groups and the Analytic Variables are comprised of both primitives and conditions.

Consequently, the SQL of Melchione cannot be equated to the Analytic Data Set Templates, Variable Groups and Analytic Variables of Applicants' invention, because it makes no sense to generate SQL from SQL. In other words, the Analytic Data Set Templates, Variable Groups and Analytic Variables of Applicants' invention are entities or objects at a level higher than (or different from) SQL that are used to generate SQL,

The recited elements of Applicants' invention comprise an automated Analytic Data Set Creation service, which simplifies and automates the process of creating analytic data sets useful for modeling and analysis out of operational data stored in the relational database.

In using the Analytic Data Set Creation service, the user first specifies one or more Variable Groups. A Variable Group is a set of Analytic Variables with similar characteristics, wherein the Analytic Variables are comprised of primitives and conditions that describe how the Analytic Variables are derived from the operational data. Primitives are base variables, while conditions are predicates, aggregates or other functions.

The user creates an Analytic Data Set Template containing the desired Analytic Variables required for a specific analysis task. These Analytic Variables are selected from one or more Variable Groups for inclusion in the Analytic Data Set Template. Moreover, execution conditions can be defined for the Analytic Data Set Template.

Finally, the Analytic Data Set Creation service performs a Smart SQL Generation function that generates SQL statements that retrieve and/or generate the desired Analytic Variables contained in the Analytic Data Set Template from the relational database using the specified primitives and condition.

A number of benefits are provided by the Analytic Data Set Creation service. For example, the service saves time and effort by analysts and support staff, so analysts can spend more time doing analysis, rather than mining data from the relational database. Moreover, the Analytic Data Set Creation service leverages work previously done by creating a library of analytic variables that can be used by anyone, which promotes consistent use of information. Moreover, the Analytic Data Set Creation service makes it much easier to deploy models for use by multiple analysts.

Thus, Applicants' attorney submits that independent claims 1, 10 and 19 are allowable over the Melchione reference. Dependent claims 2-3, 5-9, 11-12, 14-18, 20-21 and 23-27 are submitted to be allowable over the Melchione reference in the same manner as the independent claims, because they are dependent on independent claims 1, 10 and 19, respectively, and thus contain all the limitations of the independent claims. In addition, dependent claims 2-3, 5-9, 11-12, 14-18, 20-21 and 23-27 recite additional novel elements not shown by the Melchione reference.

#### IV. CONCLUSION

In view of the above, it is submitted that this application is now in good order for allowance and such allowance is respectfully solicited. Should the Examiner believe minor matters still remain

that can be resolved in a telephone interview, the Examiner is urged to call Applicants' undersigned attorney.

Respectfully submitted,

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